

SHER TREMONTE LLP

November 30, 2015

BY CM/ECF

The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11216

Re: *United States v. Hurant*, 15-mj-780

Dear Judge Mann:

I write on behalf of my client, Jeffrey Hurant, to respectfully request that his release travel restrictions be modified to allow him to travel within the continental United States. The government consents to this application.

On or about August 25, 2015, Mr. Hurant was arrested in the Eastern District of New York in connection with this matter. On the same day he was arrested, Mr. Hurant was released on a \$350,000 bond, and his travel was restricted to New York City, Long Island, and New Jersey. The Court previously modified Mr. Hurant's travel restrictions to allow him to travel to Massachusetts.

We respectfully request that Your Honor modify Mr. Hurant's travel restrictions to allow him to travel within the continental United States. In the near term, Mr. Hurant hopes to travel to San Francisco to visit relatives, and is planning additional travel in early 2016 for job interviews.

I have discussed this matter with Assistant U.S. Attorney Tyler Smith and U.S. Pretrial Services Officer Ashley Calvi. AUSA Smith consents to the requested travel modification. Officer Calvi advises that Pretrial Services is neutral on the request and that Mr. Hurant is in full compliance with all conditions of release. If this request is approved, Mr. Hurant will provide Pretrial Services with itineraries for any travel.

Respectfully submitted,

/s/
Noam Biale (NB-8072)